

In The United States District Court  
for the Western District of Virginia  
Charlottesville Division

Sides, et al, Plaintiffs vs.  
Kessler, et al, Defendants  
Civil Case No. 3:17-cv-072

CLERK'S OFFICE U.S. DIST. COURT  
AT CHARLOTTESVILLE, VA  
FILED

OCT 26 2021

JULIA C. DUDLEY, CLERK  
BY:  DEPUTY CLERK

Sworn Declaration of Christopher Cantwell  
Regarding "Ghostwriting"

I, Christopher Cantwell, do hereby aver  
under penalty of perjury on this 7<sup>th</sup>  
Day of October 2021, that the following  
is true and correct.

- 1) My name is Christopher Cantwell, I am  
over the age of 18, and I have  
knowledge of the following
- 2) On October 4<sup>th</sup> 2021, I read the  
Plaintiffs' letter to Judge Moon regarding  
several recent motions I filed, which  
described those motions as "frivolous" and  
being the product of "ghostwriting" by  
William White,
- 3) That same afternoon I was told by USP  
Marion Staff to pack my things, and on  
October 5<sup>th</sup>, I was taken to the airport,

- 4) I write today from Oklahoma's Grady County Jail, and do not have access to the aforementioned letter, or any other legal papers.
- 5) From the time I arrived at USP Marion, about June 2nd, 2021, the Commissary has been out of stock of an item called a "typing wheel", which is required to make use of the facility's typewriters.
- 6) I never learned to write cursive properly, and for good reason, I am embarrassed of my handwriting.
- 7) Since August the commissary has also been out of corrective tape (white out), and for the last ~~two~~ two weeks of September, I couldn't even buy paper because the commissary was closed for "inventory".
- 8) In late August of 2021, Mr. White heard me complaining about the typing wheel issue, and offered to lend ~~me~~ me his slightly damaged spare, which lacked the capacity to underline text.

- 9) I thanked Mr. White for his offer and remarked that this and other conditions of the CMU comprised a profoundly hostile environment for a pro se litigant.
- 10) Mr. White asked me "Is this the Charlottesville thing?" and I responded in the affirmative.
- 11) Mr. White explained that he was an experienced pro se litigator and offered his assistance.
- 12) I explained to Mr. White the most pressing issue as I saw it, which was the Plaintiffs leaving me in the dark for 14 months, followed by the US Government ~~taking~~ forcing me to part with the hard ~~drive~~ drive the Plaintiffs subsequently sent me, followed by the CMU taking weeks to review the contents of the drive after I got permission to have it sent in, and the trial timeline I objected to rapidly closing in nonetheless.
- 13) Mr. White agreed with me that the Plaintiffs were taking unfair advantage of me, and suggested we should compose a motion to Continue.

- 14) Mr. White and I spent several hours discussing details of the case. During this, Mr. White pulled up caselaw on the issues. He explained to me what he believed the law to be, and why, and he composed a draft of the motion by hand in my presence, discussing the language with me as we went, and replacing his words with mine whenever we had a difference of opinion.
- 15) After we agreed on the language, Mr. White offered to type it up for me, and I accepted his offer with gratitude.
- 16) Before sending the finished product to the court, I showed it to another inmate named Matthew Hale, who had previously told me that he had gone to law school and become a lawyer before going to prison.
- 17) Mr. Hale agreed that the Plaintiffs' conduct was outrageous, but thought a 12 month extension was "A big ask". Other than that, he told me he thought the motion was on solid ground.



18) Having recalled some controversy involving a prose filing by dismissed Defendant Mike Peinovich, but lacking memory of the details, I mentioned to Mr. White that the quality of the work we were about to submit may set off alarms, and that I may be compelled to disclose his role in its production.

19) To this, Mr. White told me "I would love to take credit for this".

20) In admiration of Mr. White's technique, I mimicked it to the best of my capacity in subsequent filings which I produced on my own. Most notably, I stopped writing in the first person except in the form of letters to the Court and in Declarations.

21) I do not know what constitutes "ghostwriting" by legal standards, but I do know that by a blogger's standard, the thoroughly collaborative efforts of Mr. White, Mr. Hale, and I, are not "ghostwriting".

22) Everything I have filed with this Court has been filed in good faith, and legally and factually meritorious to the best of my understanding.

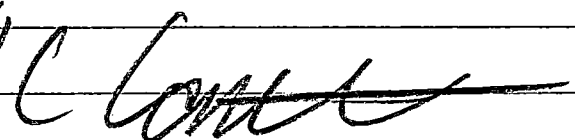
23) Plaintiffs' counsel have not invited me to withdraw any of my motions, not even when ~~we~~ I spoke to Michael Bloch on October 4<sup>th</sup>. I always take Bloch's calls, gladly.

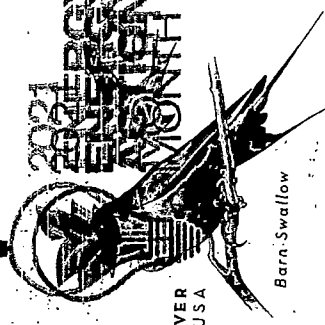
24) I take full responsibility for everything filed in my name, and should I become aware of a factual inaccuracy, I will note that there are many of those in the Plaintiffs' complaint and subsequent filings, before apologizing to the Court for my mistake, and promising not to sink to their level.

25) If my legal arguments are as frivolous as the Plaintiffs' claim, it seems to me silly that they seek the Court's 'guidance'. I believe they should be responded to and decided on the merits, but remain willing to withdraw anything I am convinced is improper, should anyone endeavor to so convince me.

Having so averred, I sayeth no more under oath.

Respectfully Submitted,  
Christopher Cantwell  
10-7-2021





OKLAHOMA CITY OK 730  
RICHMOND VA 230

8 OCT 2021 PM 6 L  
19 OCT 2021 PM 4 L

FOREVER  
USA

Barn Swallow

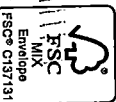
Christopher Cantrell #15992189  
c/o Smart Communications - Grady County Jail  
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This correspondence is from an inmate at  
Grady County Law Enforcement Center.  
GCLEC is not responsible for content.

Office of the Clerk

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Charlottesville Division  
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